



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

September 22, 2010

Mr. Frank Cianfrani, Chief  
Regulatory Branch  
U.S. Army Corps of Engineers  
Philadelphia District  
Wanamaker Building  
100 Penn Square East  
Philadelphia PA 19107-3390

Re: CENAP-OP-R 2009-0933-1  
Southport Marine Terminal

Dear Mr. Cianfrani,

This letter is in response to the above referenced Public Notice and the associated Environmental Assessment (EA) prepared for the Southport Marine Terminal at the eastern end of the Philadelphia Naval Business Center, formally known as the Philadelphia Naval Shipyard, in the City and County of Philadelphia, Pennsylvania. Development of this project would encompass approximately 116 acres of currently vacant land. Impacts associated with development include: dredging 35 acres within the Delaware River; work along 4,600 linear feet of Delaware River shoreline; filling 3.75 acres of non-tidal wetlands; filling 8.66 acres of a portion of an abandoned ship slip, including 1.08 acres of submerged aquatic vegetation; filling 3.62 acres of open water; and relocating 1000 linear feet of an existing tidal drainage channel. The total fill in wetlands and waters of the United States resulting from the construction activities would be approximately 16.76 acres.

The U.S. Environmental Protection Agency has reviewed this permit application and has the following comments:

- Please expand the discussion of the off-site alternatives that were considered for this project. Include in the discussion which other properties were considered and how these other sites were evaluated.
- Please provide information on whether the proposed port project will affect the current maintenance dredge plan for the Delaware River. Will the increased number of ships entering the channel increase the need for more frequent or deeper dredging?



- The EA should provide additional information on how the Southport Project fits into the Philadelphia Navy Yard Master Plan and the Philadelphia Naval Base EIS 1997. Please discuss other development that is expected on the base, or in the vicinity of the base. Discuss other natural resources currently existing on the base and may therefore be impacted by future development.
- The EA should provide a comprehensive analysis of the current conditions of the natural resources on the Delaware River and discuss the potential for adverse impacts due to reasonably foreseeable projects in the area.
- Summary Table 2-1 provides a comparative look at impacts associated with the alternatives considered. This table should identify the preferred alternative. If the preferred alternative is Alt B, then the numbers need to reflect the same values as those listed in the text and the joint permit application.
- The conceptual mitigation plan includes wetland preservation at a 4:1 ratio. This is the largest portion of the proposed plan. EPA feels that this ratio is not adequate to replace the function and services of the lost aquatic resources. EPA would prefer to see a mitigation plan with more creation and enhancement options. EPA would like additional information on mitigation for other aquatic resource impacts.
- EPA will participate in the mitigation site visit scheduled for the resource agencies. After the site visit, EPA will be able to provide additional comments specific to the mitigation plan.

Thank you for the opportunity to provide comments on this project. If you have any questions regarding these comments, please feel free to contact Jamie Davis at [davis.jamie@epa.gov](mailto:davis.jamie@epa.gov) or at 570-842-1044.

Sincerely,



Jeffrey D. Lapp  
Associate Director  
Office of Environmental Programs

